

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS and VERIZON CORPORATE
SERVICES GROUP, INC.,

Defendants.

Case No. 2:23-CV-00352-JRG-RSP

**JOINT REPORT OF MEET AND CONFER REGARDING VERIZON'S MOTIONS TO
COMPEL (DKT. NOS. 122, 123)**

Pursuant to Paragraph 9(c) of the Court's Discovery Order (Dkt. No. 39), Local Rules CV 7(h) and (i), and the Court's Standing Order Regarding "Meet and Confer" Obligations Relating to Discovery Disputes, Plaintiff Headwater Research, LLC ("Headwater") and Defendants Cellco Partnership, d/b/a Verizon Wireless and Verizon Corporate Services Group Inc. (collectively, "Verizon" or "Defendants"), (collectively, the "Parties") respectfully file this Joint Report about the results of their lead/local meet and confer on the two motions set for hearing on February 5, 2025: Verizon's Motion to Compel Corporate Document Productions (Dkt. No. 122) and Verizon's Motion to Compel Expert Reports, Transcripts, Exhibits, Written Discovery, and ESI (Dkt. No. 123).

While the Parties discussed their respective positions, they were unable to resolve the matters set forth in their briefing on Verizon's Motions to Compel and presently remain at

impasse on each motion. If there are any developments between now and the hearing date, the Parties will update the Court.

Dated: January 28, 2025

/s/ *Marc Fenster*

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**ATTORNEYS FOR PLAINTIFF,
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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for the parties conferred to discuss the substance of this Motion pursuant to Local Rule CV-7(h). Counsel for the parties agreed on the substance of this Motion and further agreed to jointly file this Motion.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 28th day of January, 2025.

/s/ Katherine Q. Dominguez
Katherine Q. Dominguez